

Comtel Telcom Assets LP
433 E. Las Colinas Blvd., Suite 1300
Irving, Texas 75039

February 25, 2009

Via ECFS Transmission

Marlene H. Dortch, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36 CPNI Certification for Comtel Telcom Assets LP

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of February 13, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Comtel Telcom Assets LP hereby files its Certification of Customer Proprietary Network information (CPNI) and supporting Statement for the year 2008. This filing is made on behalf of Comtel as well as its subsidiaries, Comtel Virginia LLC and Mercantel Communications, LP. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 972-910-1453 or becky.gipson@excel.com if you have any questions regarding this filing.

Respectfully submitted,



Becky Gipson
Sr. Director, Regulatory Affairs

Enclosure

cc: Consumers Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Best Copy and Printing (FCC@BCPIWEB.COM)

ANNUAL 47 C.F.R. § 64.2009(e) CPNI CERTIFICATION
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: 2008

Date filed: February 25, 2009

Name of company(s) covered by this certification: Comtel Telcom Assets LP and its subsidiaries, Comtel Virginia LLC and Mercatel Communications, LP

Form 499 Filer ID: 825914, 825653


Name of signatory: Jerry McGee

Title of signatory: President and CEO
Comtel Telcom Assets LP

I, Jerry McGee, certify that I am President and CEO of Comtel Telcom Assets LP, and acting as an agent of the company, I have personal knowledge of the operating procedures, as they relate to CPNI, established by Comtel Telcom Assets LP, Comtel Virginia LLC and Mercatel Communications, LP (collectively, "Comtel"), and to the best of my knowledge, information and belief, they are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification as Exhibit A is an accompanying statement explaining how Comtel's procedures ensure that Comtel is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Comtel has not taken any actions (i.e., proceedings instituted or petitions filed at either state commissions, the court system, or at the Commission) against data brokers in the past year. In addition, Comtel has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Jerry McGee
President and CEO
Comtel Telcom Assets LP

Date 2/25/09

Exhibit A
Statement of CPNI Procedures and Compliance

Comtel Telecom Assets LP

Statement of CPNI Procedures and Compliance

Comtel Telecom Assets LP, including its subsidiaries Comtel Virginia LLC and Mercantel Communications, LP, (collectively, “Comtel” or “the Company”) does not use or permit access to its customers’ CPNI to market any telecommunications or non-telecommunications services. Comtel has trained its personnel not to use CPNI for marketing purposes. Should the Company elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 C.F.R. Section 64, Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Comtel has commercially reasonable processes and procedures in place to safeguard its customers’ CPNI from improper use or disclosure by employees and to discover and protect against attempts by third parties to gain unauthorized access to CPNI. In addition, the database that contains customer records is maintained on a secure server reasonably designed to protect against data breaches. Comtel trains its personnel both at new employee orientation and through reminders and updates regarding the requirements for safeguarding CPNI. Employees are informed regarding the Company’s discipline policies for improper use or disclosure of CPNI, which may include termination. Policies and procedures regarding the proper treatment of CPNI are provided to personnel in writing so that they may refer to the documentation as needed.

Comtel maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Comtel also has procedures in place to authenticate customers’ identities and provide passwords to safeguard the disclosure of call detail over the telephone and CPNI online. As discussed in more detail below, the Company’s authentication procedures do not require the use of readily available biographical information or account information as defined by the FCC.

The Company’s process for residential customers who wish to obtain call detail by telephone is as follows. New customers select a password and provide an e-mail address at service initiation, when they can be easily authenticated. Existing customers who did not select a password at the time they initiated service and wish to subsequently obtain a password are now authenticated by Comtel by calling the customer back at their telephone number of record. As of December 8, 2007, customer passwords do not rely on the use of readily available biographical information or account information as defined by the FCC. If the appropriate password is not provided, the customer service representative is not permitted to disclose call detail over the telephone in response to a customer-initiated call, unless the customer can provide specific call detail information (e.g., date, time, call termination locations, etc.) regarding the specific call or calls in question. In such instances, call detail information may be provided to the customer to the address of record for the account.

Comtel has not established back-up authentication procedures for lost or forgotten passwords for residential customers. Instead, the customer is re-authenticated by Comtel re-sending a password to the customer's previously established address of record.

For business customers who wish to access CPNI by telephone or online, Comtel sends a PIN to the customers' address of record along with instructions to visit the Company's secure website in order to establish a password. The password can be used either to obtain information online or over the telephone. In 2007, all existing business customers were issued a PIN in this manner; all new customers are issued a PIN upon account creation. As with residential customers, business customers may not obtain call detail over the phone or any CPNI online unless they are able to provide their password.

Comtel has not established back-up authentication procedures for lost or forgotten passwords for business customers. Instead, the customer is re-authenticated by Comtel sending a system-generated random PIN to the customer's previously established email address of record, and the customer must re-establish a password.

As required under FCC rules, Comtel promptly notifies a customer at the customer's existing address of record whenever their password, online account, or address of record is created or changed. The Company does not reveal in the correspondence the changed information and notification is not sent to the new account information.

Comtel does not have any retail locations and therefore, does not disclose CPNI in-store.

Comtel has instituted procedures to notify law enforcement in the event of a breach of customers' CPNI and to reasonably ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. While the Company has not had any breaches to report, it has procedures to maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers.

Comtel has not taken any actions against data brokers in calendar year 2008.

Company did not receive any customer complaints about the unauthorized release or disclosure of CPNI in calendar year 2008.

Company has not developed any specific information with respect to the processes pretexters are using to attempt to access CPNI.